

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND LTD.,
FRONTPOINT EUROPEAN FUND, L.P.,
FRONTPOINT FINANCIAL SERVICES FUND,
L.P., FRONTPOINT HEALTHCARE FLAGSHIP
ENHANCED FUND, L.P., FRONTPOINT
HEALTHCARE FLAGSHIP FUND, L.P.,
FRONTPOINT HEALTHCARE HORIZONS FUND,
L.P., FRONTPOINT FINANCIAL HORIZONS
FUND, L.P., FRONTPOINT UTILITY AND
ENERGY FUND L.P., HUNTER GLOBAL
INVESTORS FUND I, L.P., HUNTER GLOBAL
INVESTORS FUND II, L.P., HUNTER GLOBAL
INVESTORS OFFSHORE FUND II LTD., HUNTER
GLOBAL INVESTORS SRI FUND LTD., HG
HOLDINGS LTD., HG HOLDINGS II LTD., and
FRANK DIVITTO, on behalf of themselves and all
others similarly situated,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG,
JPMORGAN CHASE & CO., THE ROYAL BANK OF
SCOTLAND PLC, UBS AG, BLUECREST CAPITAL
MANAGEMENT LLP, DEUTSCHE BANK AG, DB
GROUP SERVICES UK LIMITED, AND JOHN DOE
NOS. 1-50,

Defendants.

Docket No. 15-cv-0871 (SHS)

**DECLARATION OF DANIEL KLAHEY IN SUPPORT OF
CREDIT SUISSE GROUP AG'S MOTION TO DISMISS**

I, Daniel Klaey, hereby declare:

1. I am Director of Credit Suisse Group AG ("CSGAG"). I submit this declaration in further support of CSGAG's motion to dismiss the above-captioned action for lack of personal jurisdiction. I set forth the facts below to the best of my knowledge based upon my review of CSGAG's records.

2. CSGAG is a financial institution incorporated under the laws of Switzerland. Its headquarters is and has been located at Paradeplatz 8, 8001 Zurich, Switzerland. CSGAG's principal place of business is and has been in Switzerland.

3. In 2014, CSGAG (through its subsidiaries) had 204 branches in Switzerland. CSGAG's subsidiaries have dozens of branches and representative offices in more than fifty other countries.

4. In 2014, a minority of CSGAG's consolidated net revenue (including net revenues of all direct and indirect subsidiaries) was attributable to the United States.

5. In 2014, CSGAG on a consolidated basis (through its subsidiaries) employed 45,800 (FTE) employees worldwide, including 17,100 (FTE) employees in Switzerland. CSGAG subsidiaries had 8,718 (FTE) employees in the United States.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17th day of August 2015 in Zurich, Switzerland.

By:


Daniel Klaey